

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	CR. NO. 12-CR-00069-PB
)	
NAZAR LOPUSHANSKY)	
)	
_____)	

**DEFENDANT’S ASSENTED TO MOTION FOR EARLY TERMINATION OF
SUPERVISION**

The defendant requests that this Court issue an Order terminating the defendant’s period of supervised release. Grounds follow.

On February 4, 2013 the defendant pled guilty to 6 counts of mail fraud. On May 21, 2013 the he was sentenced to 12 months and 1 day followed be a period of 2 years of supervised release. In addition, he was ordered to pay\$253,585.62 in Restitution to the victim, Bond Safeguard, Hermitage, TN (the full address is on file with the Court).

The defendant began his period of supervised release on July 3, 2014. He has been compliant with all of his conditions of supervised release. He has consistently made the required restitution payment of \$200 per months.

The defendant is originally from Ukraine. He currently has family still living there. His grandmother, Ana Lopushansky lives in Ternopil, Ukraine. She is old and in ill health, and it is very important that the defendant be able to travel to Ukraine in order to assist her. He does not have sufficient funds to pay for a ticket, however his aunt is willing to loan him the money.

The defendant is unable to travel because he is on probation. Specifically probation has expressed a concern about the ongoing restitution payments, and what will happen if the

defendant is permitted to travel to Ukraine. The defendant has proposed that he borrow \$2,200 from his mother and pay that in a lump sum to probation. This would represent the \$200 in monthly payments that would be due over his last 10 months of supervision. He further agrees to enter into a civil judgment agreement to pay \$200 per month to repay restitution once his supervision is over. That payment would begin at the end of the 10 month period which will be covered by the \$2,200 lump sum payment. The \$200 per month payments will begin on July 1, 2016.

AUSA Robert Kinsella has no objection to this motion.

US Probation Officer Paul Daniel has no objection to this motion.

No memorandum of law is necessary to the resolution of the issues raised herein

WHEREFORE the defendant requests that this Court issue an order terminating his period of supervised release, condition upon his immediate payment of \$2,200; and his agreement to begin paying \$200 per month to the victim beginning July 1, 2016.

Respectfully submitted,
Nazar Lopushansky
By His Attorney,

Date: August 10, 2015

/s/ Jonathan R. Saxe
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CERTIFICATE OF SERVICE

I hereby certify that the above document was served to all counsel of record on August 10, 2015 and in the manner specified herein: by ECF.

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